

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DEUTSCHE BANK)
NATIONAL TRUST COMPANY,) Case No. 1:07CV01007
)
 Plaintiff,) Judge KATHLEEN M. O'MALLEY
)
 vs.) **ANSWER OF THE**
) **UNITED STATES**
) **OF AMERICA**
 DEMETRIUS JONES,)
 AKA DEMETRIUS J. JONES, et al.,)
)
 Defendants.)

Now comes the Defendant, United States of America, and for its Answer to the Plaintiff's Complaint, states as follows:

FIRST DEFENSE

1. The Defendant admits that it has an interest in the property set forth in the Plaintiff's Complaint by virtue of the liens arising under the internal revenue laws, as averred in the Complaint, in the total assessed amount of \$13,175.70 plus interest and penalties from the dates of assessment, notice of which was filed with the county recorder on April 6, 2004, as provided by law.

2. The Defendant is without knowledge or information sufficient to form a belief as to the truth of the other averments in the Plaintiff's Complaint.

SECOND DEFENSE

3. The Defendant objects to the release of any lien of the United States not specifically averred in the Complaint.

THIRD DEFENSE

4. The Defendant reserves its right to redeem as provided in 28 U.S.C. § 2410(c).

WHEREFORE, the Defendant, United States of America, demands that its tax liens be found to be good, valid and subsisting liens on the subject property; that its priority, as provided by law, be protected; that its right to redeem, as provided in 28 U.S.C. § 2410(c), be preserved; and that the court grant such other and further relief which the Defendant may be entitled to.

Respectfully submitted,

Gregory A. White
UNITED STATES ATTORNEY

By: s/Kent W. Penhallurick
Kent W. Penhallurick
Assistant U.S. Attorney
400 United States Court House
801 W. Superior Avenue
Cleveland, OH 44113-1852
Phone: (216) 622-3682
Fax: (216) 522-4982
E-Mail: kent.penhallurick@usdoj.gov
Registration No. 0019131

Attorneys for the Defendant
United States of America

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of the United States of America was filed electronically. Notice of this filing will be sent by regular U. S. Mail this 18th day of May, 2007, to the following:

Demetrius Jones
Lisa Jones
4530 Monticello
Cleveland, OH 44143
Defendants

CitiMortgage, Inc.
1000 Technology Dr.
O'Fallon, MO 63368-2240
Defendant

Delta Funding Corporation
c/o Servicing Agent
1000 Woodbury Rd., Ste. 200
Woodbury, NY 11797
Defendant

City of Cleveland Heights
40 Severance Circle
Cleveland Heights, OH 44118
Defendant

James L. Sassano, Esq.
Carlisle, McNellie, Rini, Kramer & Ulrich Co., L.P.A.
24755 Chagrin Blvd., Ste. 200
Cleveland, OH 44122
Attorney for Plaintiff

By: s/Kent W. Penhallurick
Kent W. Penhallurick
Assistant U.S. Attorney
(216) 622-3682